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Docket 15  
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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

17 AUG 1993

IN REPLY REFER TO:

7330-7/1700A3

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AUG 19 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Honorable Ted Stevens  
United States Senate  
522 Hart Office Building  
Washington, D.C. 20510

Dear Senator Stevens:

This is in reply to your letter of August 5, 1993, in which you inquired on behalf of your constituent, Major General Hugh Cox III, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

The proposals in the Notice reflect to a large extent concepts and proposals submitted in the initial inquiry stages of this proceeding. None of the proposals set forth in the Notice, however, are engraved in stone. Indeed, the proposals represent our best judgment at this stage of the proceeding on steps that must be taken to improve the regulatory climate for users of the private land mobile radio spectrum below 512 MHz. I have enclosed for your information a copy of that part of the Notice that describes the numerous proposals, plus a discussion paper released March 1, 1993. In sum, the final rules will take the special needs of rural users into account.

We are sensitive to the needs of users of private land mobile radio spectrum and the impact that these proposals may have on their radio systems, including the costs of required modifications. Your constituent's letter will be included in the record of the proceeding and will be fully evaluated when we develop final rules.

Thank you for your interest in this proceeding. We expect to issue final rules in 1994.

Sincerely,

*Edward R. Jacobs*

Edward R. Jacobs  
Deputy Chief, Land Mobile and  
Microwave Division

Enclosures

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## United States Senate

COMMITTEE ON APPROPRIATIONS  
WASHINGTON, DC 20510-8025

PRB  
92-235  
P V  
3227 JH9

August 5, 1993

The Honorable James H. Quello  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Jim:

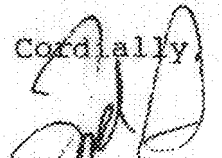
Enclosed is a copy of a letter that I received from Major General Hugh Cox, III, Commissioner of the Alaska Department of Military and Veterans Affairs, regarding the State of Alaska's concerns about the FCC's proposal to revise the policies governing private land mobile radio service (PR Docket 92-235).

As you will note, the Department of Military and Veterans Affairs' main interest in the FCC's proposal is its potential impact on Alaska's emergency communications network. Major General Cox is requesting that the State of Alaska be exempt from Phase I of PR Docket 92-235, as currently drafted.

I would appreciate any assistance you could provide in granting the State of Alaska's request.

With best wishes,

Cordially,

  
TED STEVENS

Enclosure

# STATE OF ALASKA

## DEPARTMENT OF MILITARY AND VETERANS AFFAIRS

### OFFICE OF THE COMMISSIONER

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WALTER J. HICKEL, GOVERNOR

P.O. BOX 5800  
FORT RICHARDSON, AK 99505-58  
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June 30, 1993

The Honorable Ted Stevens  
United States Senate  
522 Hart Building  
Washington, D.C. 20510-0201

Dear Senator Stevens:

The Federal Communications Commission (FCC) proposes to revise the private land mobile radio service and the policies governing them.

Alaska's response to the FCC is attached.

Information provided to my staff by the Alaska Division of Information Services indicates the cost of these changes to Alaska would be in the 26 million dollar range.

My department's interest in this issue is primarily due to the potential impact on Alaska's emergency communications network. If Alaska is required to comply with Phase 1 requirements, the potential disruption of our currently insufficient emergency communications network could be harmful.

I recommend your support of Alaska's request to be exempt from Phase 1.

Sincerely,

HLC:PW:lb  
Attachment: as stated

  
Hugh L. Cox III  
Commissioner

cc: John Katz, Special Counsel State/Federal Relations

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )

Replacement of Part 90 by Part 88 to )  
Revise the Private Land Mobile Radio )  
Services and Modify the Policies )  
Governing Them )

PR Docket 92-235

COMMENTS FROM THE  
STATE OF ALASKA  
DIVISION OF INFORMATION SERVICE  
TELECOMMUNICATIONS SECTION

John Morrone  
Deputy Director

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )

Replacement of Part 90 by Part 88 to )

Revise the Private Land Mobile Radio )

PR Docket 92-235

Services and Modify the Policies )

Governing Them )

To: The Commission

Comments

The State of Alaska, Division of Information Services respectfully submit these comments to the Commission's Notice of Proposed Rulemaking in the above captioned proceeding.

The Division of Information Services/Telecommunications Section is responsible for the development, design, installation, and maintenance of two way radio systems for the state agencies in Alaska. Presently, our inventory shows approximately 10,000 two way radio portables, mobiles, base stations, and pagers in operation by various state agencies we serve.

Compliance with Phase I of the FCC proposal of complete conversion to the new first stage 10 KHz/12.5 KHz narrowband standards by January 1, 1996 will cause considerable hardship in terms of cost and manpower to the state. Furthermore, inquiries with various two way radio manufacturers indicate that the

conversion will entail more than just a simple adjustment of the transmitter deviation control on each two way radio. These two way radio manufacturers indicate that we will have to make conversions on the receiver as well in terms of special filtering. In some cases, we are being told that the cost of conversion on the receiver may prove to be cost prohibitive. Recommendations in some cases call for replacement of the radio unit.

We agree with the FCC position that narrowbanding must occur in order to promote more efficient use of the frequency bands below 512 MHz, and in order to evolve out of older technologies. The FCC's ultimate goal of evolving into the Phase II 5 KHz/6.25 KHz narrowband standard by January 1, 2004 appears reasonable and allows for sufficient time to evolve our systems.

We must, however, question the need to convert to the Phase I 10 KHz/12.5 KHz interim standard. Alaska does not experience the degree of channel congestion as in other parts of the country. Our limited dollars can be better spent trying to evolve our systems to the January 1, 2004 final standard with 10 years to effect the change. One recommendation is that two way radio manufacturers be encouraged to produce radios that can allow users to migrate over this period of time to the new standard without a radical replacement of the entire system.

Accordingly, we request that the Commission exempt the State of Alaska from mandatory transition to the Phase I standard.

### Reduced ERP and HAAT Limits

The FCC proposal to set limits on transmitter power and antenna heights on base stations/repeaters with the goal of creating frequency reuse every 50 miles will also cause considerable hardship in terms of cost and ability to provide radio services in the state.

Alaska is a vast state in terms of land area. Many of our communication sites are on remote mountain peaks with coverage patterns well in excess of 50 miles. Since most of these sites are accessible only by helicopter, construction and operation of a site is a considerable expense. Because of the cost involved to provide a communication facility is so high, the area served by the site is maximized by choosing a high location, using the highest gain antenna which can withstand the location, choosing a VHF frequency, and using the best radio possible with the power available at the location. This approach is the most cost effective means of providing communications to many areas in the state.

The public interest would not be served by artificially limiting the area to be served by one location and adding additional locations at great expense. Such costs are not necessary in a state where channel congestion poses few problems now and possible future congestion would be handled by the spectrum efficiency proposals of trunked operation and reduced bandwidth channel spacing.

Accordingly, we propose that the State of Alaska be exempted

from the ERP/HAAT limitations.


Permitting Trunked Operations

Trunked operation should be permitted in the bands affected by this proceeding. Of particular interest is the permitting of trunked operation on VHF channels. Trunking technology has not been implemented by the state as of yet because the frequencies available to date for trunking operation do not provide the necessary propagation to serve an area without the addition of more intermediate sites. This technology provides operational advantages presently not available with the existing conventional two way radio technologies. Two way radio manufacturers should be encouraged to produce such products to allow users to transition to the new narrowband standard, and take advantage of the benefits of trunked operations on VHF frequencies.

We appreciate the opportunity to comment on the FCC's proposal. We hope that the FCC will give our concerns and recommendations consideration.

Respectfully submitted,

State of Alaska  
Division of Information Services  
Telecommunications Section

  
Harlan Adkison

For: John Morrone  
Deputy Director